

EXHIBIT B

From: David Perlson [<mailto:davidperlson@quinnemanuel.com>]
Sent: Friday, April 28, 2017 11:13 AM
To: Jeff Nardinelli; Gonzalez, Arturo J.; QE-Waymo
Cc: Waymo Internal - Attorneys; Karen Dunn; Hamish Hume
Subject: [EXT] RE: Waymo Privileged Log

Arturo, once again Uber has filed a letter brief without a proper meet and confer, much less a response to our valid questions regarding Uber's evolving requests. And Uber has again misled the Court by not attaching our response to your letter brief, leaving an implication we did not respond. Unlike Uber, we seek to avoid disputes for the Court to resolve, rather than create them. Thus, in the interest of compromise, we provide the further response below, to put this issue to rest.

Without waiver of attorney-client privilege, attorney work product protection, or any other applicable privilege or protection and after a reasonable and diligent investigation, Waymo states that Google Inc.'s first communication in relation to the possibility of legal action against Uber was on or about August 23, 2016, shortly after Uber announced its acquisition of Otto for \$680 million on August 18, 2016. It was not until December 13, 2016, however that Waymo received an inadvertently sent email showing that Uber was using a near-replica of Waymo's current-generation trade secret LiDAR circuit board. Then it was not until February 3, 2017 that Waymo received additional information regarding Uber's LiDAR designs and plan for deployment in response to a Nevada public records request. Uber then filed its Complaint on February 23, 2017

From: Jeff Nardinelli
Sent: Friday, April 28, 2017 8:25 AM
To: Gonzalez, Arturo J. <AGonzalez@mofo.com>; QE-Waymo <gewaymo@quinnemanuel.com>
Cc: Waymo Internal - Attorneys <Waymo_Internal_Attorneys@mofo.com>; Karen Dunn <KDunn@BSFLLP.com>; Hamish Hume <hhume@BSFLLP.com>
Subject: RE: Waymo Privileged Log

Arturo,

What basis do you have to suggest the logs we have served are incomplete or to demand the information you seek? We are not aware of any RFP that required us to produce or log ALL communications relating to the internal investigation of Anthony Levandowski, we have produced or logged documents indicating when Gary Brown performed the analyses identified in his Declaration (and you also have Mr. Brown's testimony on timing issues), and last night we identified the date of Google's first communication in relation to the possibility of legal action against Anthony Levandowski. As to your request for the first date of communication regarding the possibility of legal action against Uber, you repeatedly during meet and confers stressed your request to know the single first date of communications responsive to RFP 4 which requested "Communications about the possibility of pursuing a legal action against Anthony Levandowski *or* Defendants," and the Court correspondingly ordered disclosure of a single date. We supplied that last night.

We are happy to meet and confer but would like more information in advance as to what you are concerned with so it can be productive.

Thanks,
Jeff

-----Original Message-----

From: Gonzalez, Arturo J. [<mailto:AGonzalez@mofo.com>]

Sent: Thursday, April 27, 2017 2:27 PM

To: QE-Waymo <gewaymo@quinnemanuel.com>

Cc: Waymo Internal - Attorneys <Waymo_Internal_Attorneys@mofo.com>; Karen Dunn <KDunn@BSFLLP.com>; Hamish Hume <hhume@BSFLLP.com>

Subject: Waymo Privileged Log

Quinn team,

We are concerned that the Quinn privileged logs contain very little information regarding when you began investigating Anthony Levandowski. Consider this a formal attempt to confer on that issue? Have you logged all relevant communications? We would also like to know when Quinn was first consulted regarding a possible claim against Anthony or Uber.

We are available to confer on these topics today or tomorrow. Please let us know when you are available to confer

Charlie, please do not ignore my emails and then complain that we have not conferred.

Arturo

Sent from my iPhone

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